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June 28, 2016

VIA EMAIL AND FIRST CLASS MAIL

The Hon. Karen V. Gregory Secretary of Federal Maritime Commission 800 North Capitol St. Room 1046 Washington, D.C. 20573

Re: Docket No. 15-11 – Ovchinnikov v. Hitrinov

Dear Ms. Gregory:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1. Respondents' Revised Motion for Extension of Time

Please contact me if you have any questions.

Best regards,

Anjali Vohra

Enclosures

FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET Al

v.

MICHAEL HITRINOV, ET AL

Consolidated With

DOCKET NO. 1953(I)

KAIRAT NURGAZINOV, ET Al

ν.

MICHAEL HITRINOV, ET AL

RESPONDENTS' REVISED MOTION FOR EXTENSION OF TIME

Pursuant to FMC Rules 69 and 71, Respondents Empire United Lines and Michael Hitrinov hereby revise their Motion for Extension of Time filed on June 21, 2016, in which Respondents moved for an extension until July 15, 2016 of any and all deadlines applicable to Respondents that are or may be due before that date, including but not limited to their Reply to Complainants' Response to Respondents' Motion for Judgment on the Pleadings. For the reasons discussed below, Counsel now requests an extension of ten (10) days after his first day back in the office.

As previously noted, Counsel's father has been seriously ill. His condition has worsened and he is now deemed likely to pass any day. Counsel is returning early from his trip overseas but will immediately go out of town to be with his father and will likely return no earlier than

4826-3849-9380.1

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July 8 after Shiva is finished. Given the indeterminate nature of the situation, the undersigned requests an extension of time until ten (10) days from his first day back in the office. The undersigned will file a notice of return on the day he is back in the office.

For the foregoing reasons, Respondents respectfully request that the foregoing motion for extension of time be granted.

Respectfully submitted,

Eric Jeffrey

Anjali Vohra

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Respondents' Revised Motion for Extension of Time by email and first class mail to the following:

Marcus A. Nussbaum, Esq. P.O. Box 245599 Brooklyn, NY 11224 <u>Marcus.nussbaum@gmail.com</u>

Seth M. Katz, Esq. P.O. Box 245599 Brooklyn, NY 11224

Dated at Washington, DC, this 28th day of June, 2016.

Anjali Voha

Counsel for Respondents